EXHIBIT H
REDACTED

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	
v.	
GOOGLE LLC,	
Defendant.	

PLAINTIFF'S SUPPLEMENTAL RESPONSE TO DEFEDANT'S INTERROGATORY NO. 18

Plaintiff, Singular Computing LLC (**"Singular"**), responds to Defendant, Google LLC (**"Google"**), third set of interrogatories as follows.

GENERAL OBJECTIONS

Singular objects to the Definitions and Instructions as prolix and confusing, and has ignored them in preparing this response.

Singular objects to the Interrogatories as:

1) overly broad and unduly burdensome;

2) seeking irrelevant information;

3) seeking information protected by the attorney-client privilege or the work-product doctrine;

4) seeking discovery the burden or expense of which outweighs the likely benefit; and

5) seeking the subject of expert testimony before the time, and other than in the manner, specified by order of this Court and the Federal Rules of Civil Procedure.

These General Objections are incorporated by reference, without restatement, into the specific responses below.

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RESPONSES

INTERROGATORY NO. 18

Describe the procedures **you used to conduct the testing cited in Singular's First Amended Complaint, ¶¶ 94, 111, 129, and the testing referenced in Singular's infringement contentions,** including, without limitation, when the testing was conducted, who conducted the testing, what source code was used for the testing, where the testing was conducted, what compiler command line was used to compile the source code, what hardware was used to run the tests, and what command-line arguments were used to run the executable code, as well as any other details necessary to allow one to reproduce the results Singular relies upon in its First Amended Complaint and infringement contentions.

RESPONSE:

Singular reincorporates by reference its General Objections. Singular specifically objects to this Interrogatory on the grounds that it seeks irrelevant information. Singular also objects to this Interrogatory to the extent that it seeks to discover information protected by the attorney-client privilege or the work-product doctrine. Singular further objects to this interrogatory on the grounds that it causes Google to exceed the number of interrogatories allowed under the Scheduling Order in this case; accordingly, Singular reserves the right to move to strike this interrogatory.

Further, base**d on representations made by Google's attorney Anna Porto during a meet-**and-confer conducted on Friday, April 2nd 2021, Singular understands that the intended scope of this interrogatory is limited specifically to the testing code that produced the output cited in **Singular's First Amended Complaint.**

Subject to and without waiving its objections, Singular responds as follows:

The testing **code that produced the output cited in Singular's First Amended Complaint** has been produced as SINGULAR-00012094-00012100.

The testing that produced the output cited in Singular's First Amended Complaint was conducted on or around late 2019.

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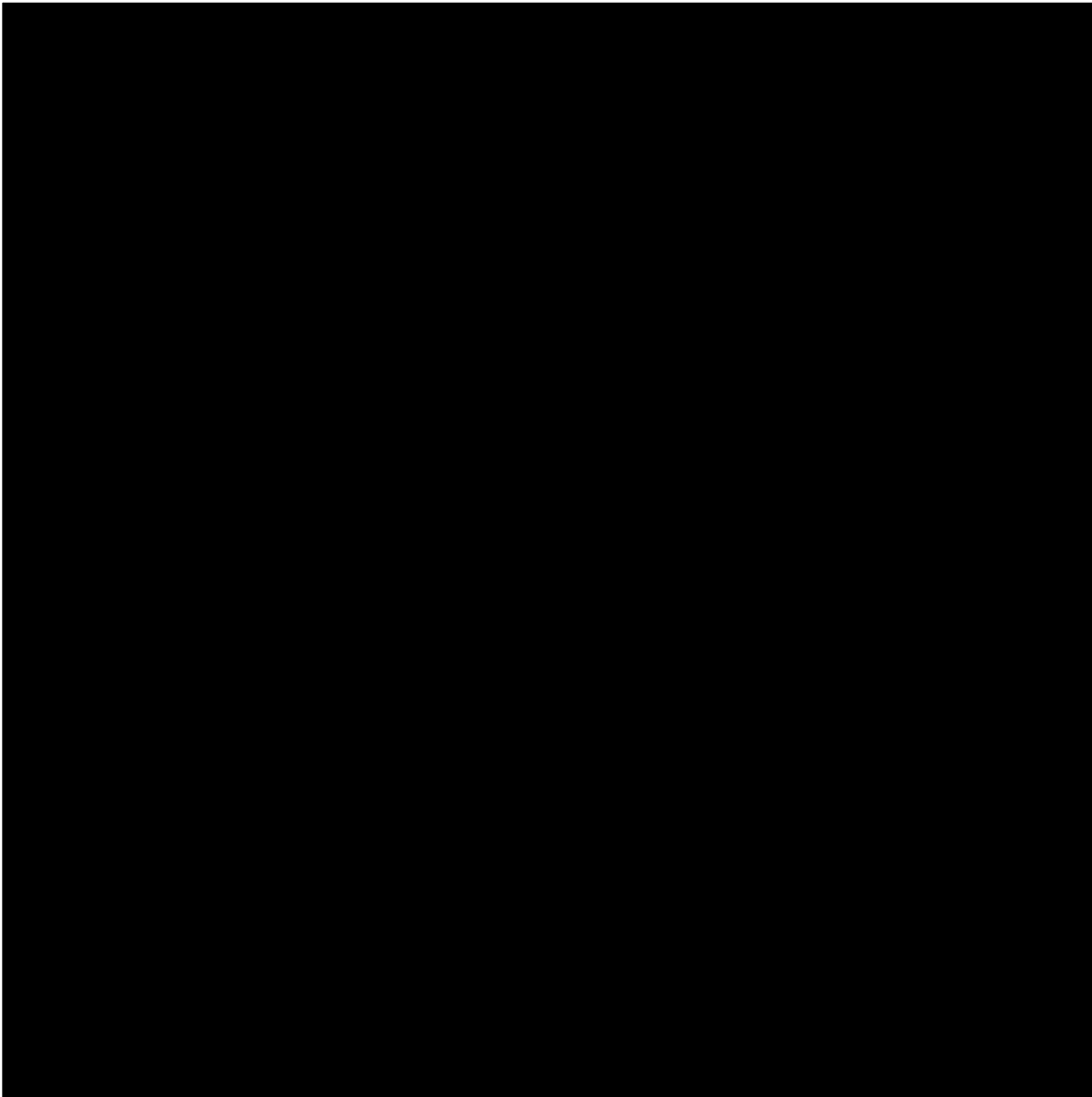
All of the information above regarding the testing **code referenced in Singular's**

Infringement Contentions was already provided to Google in September/October, 2020.

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Dated: June 28, 2021   Respectfully submitted,

                                        /s/ Kevin Gannon
                                        Paul J. Hayes (BBO #227000)
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                                        ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on June 28, 2021, I served this document on Defendant by causing a copy to be sent via electronic mail to its counsel of record.

                                        /s/ Kevin Gannon

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